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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA, SOUTHERN DIVISION

12 AZIZA KINNEY,

13 Plaintiff,

14 v.

15 GEICO CASUALTY COMPANY; and DOES
16 1 THROUGH 100, INCLUSIVE,

17 Defendants.

18 Case No. 2:20-cv-02167-GMN-NJK

**REQUEST TO EXTEND DEADLINE TO
FILE JOINT PRETRIAL ORDER**

19 COME NOW PLAINTIFF AZIZA KINNEY (“Plaintiff”), by and through her counsel of
20 record, Mona Asberom, Esq. and James Leonard Brown, Esq. of Asberom & Brown, LLC, and
21 DEFENDANT GEICO CASUALTY COMPANY, by and through its counsel of record, Jonathan
22 W. Carlson, Esq., Cheryl A. Grames, Esq., and Stacy Norris, Esq. of McCormick, Barstow,
23 Sheppard, Wayte & Carruth LLP, and request an extension of the current deadline for filing the Joint
24 Pretrial Order to Monday May 17, 2023. The current deadline (Monday May 3, 2023) was set forth
25 in the Order as to the parties’ competing Motions for Partial Summary Judgment (ECF No. 40),
26 which Order was filed on March 31, 2023.

27 Counsel for the parties have been in steady communication regarding the drafting of the
28 Joint Pretrial Order, and have a working draft to which both have contributed. Counsel conferred

1 on Tuesday April 18, 2023 and made progress as to achieving agreement on a number of items that
2 must be discussed and included in the Joint Pretrial Order. Due to summary judgment having been
3 granted in part and denied in part, the parties are carefully constructing ways to streamline the
4 presentation of evidence and what, if anything, can be argued in advance of trial as to questions of
5 law. Counsel have agreed to a second conference, but the scheduling of same has proven
6 challenging. Counsel have tentatively agreed to confer again on Tuesday April 25, 2023. In an
7 abundance of caution, however, counsel believe a short extension is necessary to ensure sufficient
8 time to revise the final version of the Joint Pretrial Order and have time for a final conference should
9 one be necessary. To that end, the parties request an extension of two weeks to and including
10 **Monday May 17, 2023.**

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The parties maintain that good cause exists for this brief extension as counsel have been actively working together to file a Joint Pretrial Order that the Court will accept forthwith.

DATED: April 24, 2023

ASBEROM & BROWN, LLC

By /s/James Leonard Brown
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Attorneys for Plaintiff

DATED April 24, 2023

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By: /s/Stacy Norris

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Nevada Bar No. 10536
Cheryl A Grames
Nevada Bar No. 12752
Stacy Norris
Nevada Bar No. 15445

Attorneys for GEICO CASUALTY COMPANY

IT IS SO ORDERED.

DATED this 24 of April, 2023

2023

D. Brian
U.S. District Court Judge / U.S. Magistrate Judge